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August 31, 2015

VIA ECF

Honorable Arlene R. Lindsay United States Courthouse Eastern District of New York 814 Federal Plaza Central Islip, New York 11722

> Re: <u>Jones v. Suffolk County & Parents for Megan's Law, et al.</u>, Docket No. 15-cv-0111 (JS) (ARL)

Dear Judge Lindsay:

We represent the Plaintiff in the above-referenced action. In accordance with this Court's May 4 Order granting Plaintiff's motion to proceed under pseudonym in this litigation, the parties respectfully submit for Your Honor's consideration and approval the enclosed proposed Protective Order.

We appreciate the Court's attention to this matter.

Respectfully submitted,

____/s/___

Erin Beth Harrist Christopher Dunn New York Civil Liberties Union

Larry Spirn Spirn & Spirn, Esqs.

Counsel for Plaintiff

cc: Rudolph Baptiste, Esq.
Assistant County Attorney
Suffolk County Department of Law
Counsel for Defendant Suffolk County

Michael A. Miranda, Esq. Richard Epstein, Esq. Miranda Sambursky Slone Sklarin Verveniotis LLP Counsel for Defendant Parents for Megan's Law